

**IN THE DISTRICT COURT OF THE UNITED STATES
FOR THE MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION**

UNITED STATES OF AMERICA)	
)	
v.)	CR. NO. 2:06cr153-MHT
)	
IRA KENYATTA MCGHEE)	
a/k/a “Yada”)	
)	

United States’ Motion for Downward Departure for Substantial Assistance

The United States moves this Court to reduce Defendant Ira Kenyatta McGhee’s sentence and sentence him to term of one year probation based on McGhee’s substantial assistance in this case. As grounds for this Motion, the United States notes:

1. McGhee has cooperated with the United States. During his cooperation, McGhee provided substantial information in the case of *United States v. Willis, et al.*, 06-cr71-MEF (M.D. Ala. 2007). McGhee eventually testified at the trial in that case, and his testimony was important in obtaining a successful conviction of Ms. Wills.

3. The United States submits that to the best of its knowledge McGhee has been truthful with federal investigators. As part of the plea agreement, McGhee has waived his right to appeal and/or collaterally attack the sentence imposed in this case. Therefore, United States asks this Court to depart and sentence McGhee to a term of one year probation under Guidelines § 5K1.1 based upon McGhee’s substantial assistance.

Respectfully submitted this the 17th day of July, 2007.

LEURA G. CANARY
UNITED STATES ATTORNEY

/s/ Christopher Snyder
CHRISTOPHER A. SNYDER
Assistant United States Attorney
One Court Square, Suite 201
Montgomery, AL 36104
Phone: (334) 223-7280
Fax: (334) 223-7135
E-mail: christopher.a.snyder@usdoj.gov

CERTIFICATE OF SERVICE

I hereby certify that on July 17, 2007, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to Tiffany McCord.

/s/ Christopher Snyder
CHRISTOPHER A. SNYDER
Assistant United States Attorney